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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LINDA LEE SIPPLE, ON BEHALF OF
HERSELF AND ALL OTHERS SIMILARLY
SITUATED

Plaintiff,

v.

ZIONS BANCORPORATION, N.A.,

Defendant.

Case No. 2:21-cv-00904-GMN-NJK

**ORDER TO
EXTEND THE TIME FOR DEFENDANT
ZIONS BANCORPORATION, N.A. TO
RESPOND TO THE COMPLAINT**
[SECOND REQUEST]

Plaintiff Linda Lee Sipple (“Sipple”) and defendant Zions Bancorporation, N.A. (“Zions”), by and through their undersigned attorneys, hereby stipulate and agree as follows:

1. Plaintiff filed a putative class action Complaint against Zions in the Eighth Judicial District Court for the State of Nevada in the above-captioned action on February 17, 2021.

2. Plaintiff served the Complaint on Zions on April 8, 2021.

3. On May 7, 2021, Zions removed the matter to this Court pursuant to 28 U.S.C. § 1441 and 28 U.S.C. § 1332(d).

4. Pursuant to Fed. R. Civ. P. 81(c)(2), the deadline for Zions to respond to the Complaint was May 14, 2021.

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1 5. On May 17, 2021, the Court granted the parties' Stipulation and Order to Extend the
2 Time for Defendant to Respond to the Complaint [First Request], thereby extending the response date
3 to June 7, 2021.

4 6. On May 28, 2021, Sipple advised that she may seek to remand this matter. On June 2,
5 2021, the parties met and conferred, but did not resolve the dispute, and Sipple intends to file her
6 remand motion no later than June 7, 2021.

7 7. Based on this stated intention, the parties submitted a Stipulation and Order to Extend
8 the Time for Defendant to Respond to the Complaint [Second Request] [Doc. 8] on June 3, 2021,
9 requesting the Court extend the response deadline until twenty-one (21) days after the Court enters an
10 order on the remand motion.

11 8. The Court denied the stipulation [Doc. 9], noting (a) that it was uncertain if Sipple would
12 seek remand and (b) that the parties did not explain how the stipulation would conserve judicial
13 resources by effectively staying discovery for an unknown period of time.

14 9. Regarding the Court's initial concern, on June 4, 2021, Sipple confirmed she would be
15 filing her motion for remand by midnight the same day. As such, Sipple has stated that she will file a
16 motion for remand and the uncertainty identified by the Court has been removed.

17 10. As to the Court's second concern, the point is well taken. The parties contend that
18 proceeding immediately with discovery in this case will force the expenditure of unnecessary party
19 resources that can better be devoted to other potential avenues for the resolution of this matter,
20 including preliminary settlement discussions that will continue and likely be influenced by the
21 substance of the remand motion as well as the Court's order regarding said motion.

22 11. That being said, the parties respect the Court's view of an unlimited extension. As such,
23 the parties have further conferred and agreed to extend the deadline for Zions to respond to the
24 Complaint by thirty (30) days from June 7, 2021 up to and including July 7, 2021.

25 12. Good cause supports the request because the parties will have an opportunity to evaluate
26 the merits of Sipple's remand motion, explore any impact on the potential for further settlement
27 discussions, and prepare an appropriate response to the pending Complaint.
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